

450 Seventh Ave Suite 1408 New York, NY 10123

October 28, 2022

Rafi Hasbani, Esq. T. 212.643.6677 F. 347.491.4048 rhasbani@hasbanilight.com

Licensed in NY and NJ

Hasbani & Light, P.C. 450 Seventh Ave Suite 1408 New York, NY 10123

Via ECF

The Honorable Judge Taryn A. Merkl Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

RE: Green Mountain Holdings (Cayman) LTD v. McEachern et al Case Number: 1:22-cv-00858

Dear Judge Merkl,

Our office represents the plaintiff, Green Mountain Holdings (Cayman) LTD. ("Plaintiff") in the above-entitled action. The Plaintiff submits this letter in response to Judge your Honor's order dated 10/28/2022. As discussed on the telephonic conference on 10/06/2022, the parties would confer prior to 10/27/2022 to fill out the discovery order. Since the last conference, the undersigned has emailed and called Ms. Baez on numerous occasions and there has been no response. Plaintiff requests permission to fill out the discovery order without conferring with Defendants for the court's approval.

Thank you for your time and attention to this matter.

Respectfully submitted,

/s/ Rafi Hasbani Rafi Hasbani, Esq.